



SEALED

Office of the United States Attorney
District of Nevada
501 Las Vegas Boulevard, Suite 1100
Las Vegas, Nevada 89101
(702) 388-6336

CHRISTOPHER CHIOU
Acting United States Attorney
District of Nevada
Nevada Bar Number 13644
EDWARD G. VERONDA
Assistant United States Attorney
501 Las Vegas Boulevard South, Suite 1100
Las Vegas, Nevada 89101
Tel: 702.388.6336 / Fax: 702.388.6418
Edward.G.Veronda@usdoj.gov

FILED.

DATED: 3:39 pm, November 02, 2021

U.S. MAGISTRATE JUDGE

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KIRK RICHARD BALDUCCI,

Defendant.

Case No.: 2:21-mj- 00936-DJA

**MOTION TO SEAL
(Under Seal)**

GOVERNMENT'S MOTION TO SEAL

COMES NOW the United States of America, by and through CHRISTOPHER CHIOU, Acting United States Attorney, and Edward G. Veronda, Assistant United States Attorney, and respectfully moves this Honorable Court for an Order sealing the Affidavit, together with the Court's Order, in the above-captioned matter until such time as this Honorable Court, or another Court of competent jurisdiction, shall order otherwise.

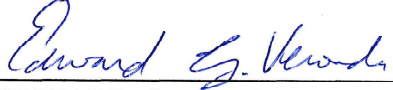
Good cause supports sealing these search warrant documents. Investigation is still ongoing and the targets have not yet been arrested. Sealing the documents is necessary to avoid alerting targets of the investigation. If the targets were notified of the contents of this

1 warrant affidavit, they would likely attempt to obstruct the investigation by destroying
2 evidence, notifying co-conspirators, or changing their current modus operandi.

3 The Government submits that disclosure of the information might possibly jeopardize
4 the investigation, and that its right to secrecy far outweighs the public's right to know.

5
6 DATED this 2nd day of November, 2021

7 CHRISTOPHER CHIOU
8 Acting United States Attorney
9 District of Nevada

10 
11 EDWARD G. VERONDA
12 Assistant United States Attorney
13
14
15
16
17
18
19
20
21
22
23
24

FILED.
UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA DATED: 3:39 pm, November 02, 2021
U.S. MAGISTRATE JUDGE

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KIRK RICHARD BALDUCCI,

Defendant.

Case No.: 2:21-mj-00936-DJA

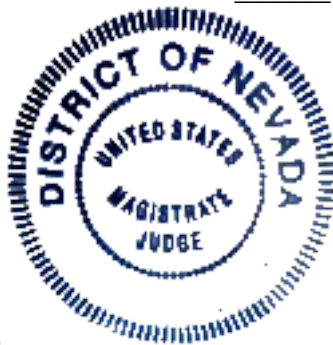
SEALING ORDER
(Under Seal)

SEALING ORDER

Based on the pending Application of the Government, and good cause appearing therefor,

IT IS HEREBY ORDERED that the Affidavit, together with the Court's Order, in the above-captioned matter shall be sealed until further Order of the Court.

DATED this 2nd day of November, 2021.



A handwritten signature in blue ink, appearing to read "Daniel J. Albregts", written over a horizontal line.

HON. DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE